

In Re: Grant, John William
Debtor (s)

Case No. 20-02914
Chapter 7
Carol A. Doyle

NOTICE OF MOTION

To: **U.S. Trustee Office** and **Trustee David Liebowitz** through ECF electronic filing submission notice and **debtor**, through US Post, and **attached list of creditors** through U.S. Post.

PLEASE TAKE NOTICE that on Thursday, May 28, 2020 10:00AM or soon thereafter as counsel may be heard, we shall appear before the **Honorable Judge Carol A. Doyle** in her courtroom **742** or before any Judge who may be sitting in her stead as may be designated on that date at the United States Bankruptcy Court 219 S. Dearborn St, Courtroom 742 Chicago, Illinois 60604 and then and there present our attached **Motion to Convert to Chapter 13**, a copy of which is hereby attached and herewith served upon you and shall request an order in compliance therewith at which any opposition to the attached motion must be filed within 14 days following service of the motion if you so desire.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that they served a copy of this notice along with motion upon the above service list through ECF electronically notice through the court and to debtor in a properly addressed envelope, with proper postage prepaid, deposited through the United Postal Offices address below on this date May 14, 2020.

S/S/ S.M. de Rath

S.M.de Rath, Esq
200 S. Wacker Dr
32nd Floor
Chicago, IL 60606
(312) 834-3453
#6189298

In Re: Grant, John William
Debtor (s)

Case No. 20-02914
Chapter 7
(Carol A. Doyle)

SERVICE LIST:

Registrants Served Through The Court's ECF Electronic Court Notice For Registrants

Patrick S. Layng, United States Trustee
219 South Dearborn Street,
Suite 873
Chicago, Illinois 60604

William Neary, United States Trustee
219 South Dearborn Street,
Suite 873
Chicago, Illinois 60604

Bankruptcy Trustee:
David Liebowitz

Parties Served Via First Class Mail:

Grant, John William 2265 W. 111th Place Chicago, IL 60643

The following separate attached List of creditors

FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re: Grant, John William

Case No. 20-02914
Chapter 7
(Honorable Judge Carol A. Doyle)

Debtor (s)

MOTION TO CONVERT CHAPTER 7 TO CHAPTER 13 BANKRUPTCY CASE

NOW COMES the debtor, by and through his attorneys, and moves this Honorable Court pursuant to 11 U.S.C. § 706, for an order allowing her to convert from a Chapter 7 to a Chapter 13 of the title 11 of the United States Bankruptcy Code. In support thereof, debtor alleges as follows:

1. Debtor filed his voluntary petition for relief under Chapter 7 of the Bankruptcy Code on 1/31/2020.
2. Debtor's §341 Meeting of Creditors is 5/20/2020
3. Debtor's case is assigned to David Liebowitz
4. Debtor wishes to convert his Chapter 7 bankruptcy case to a Chapter 13 bankruptcy case because he has \$73,000 of IRS tax debt. Debtor thought he would be able to take care of the IRS debt by himself since it is not provided for in a Chapter 7. Debtor he has been unable to do that which has caused him a lot of stress. Debtor has serious health problems which stress is very detrimental to his health. Debtor wishes to pay and work out the \$73,000 debt obligation with the IRS through the Chapter 13 plan.
5. He is employed and able to pay his debts in a Chapter 13 plan.
6. Debtor has budgeted his expenses so that he has over \$300 a month to pay his creditors in a Chapter 13 plan.

WHEREFORE, the Debtor's prays this Honorable Court:

- A. For an Order allowing Debtor to convert his case from Chapter 7 to a Chapter 13 under the United States Bankruptcy Code.

Respectfully submitted:

s/s *S.MdeRath*

Attorney for Debtor

S.M.de Rath, Esq
200 S. Wacker Dr
32nd Floor
Chicago, IL 60606
(312) 834-3453
#6189298

FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re: Grant, John William

Case No. 20-02914
Chapter 7
(Honorable Judge Carol A. Doyle)

Debtor (s)

ORDER TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

THAT THIS CAUSE COMING on to be heard before **Honorable Judge Carol A. Doyle** before this Court, due Notice having been given, the Honorable Court apprised in all the premises for the debtor filing her motion and application to convert in accordance with 11 U.S.C. §706 (a), seeking to convert this case under Chapter 7 to a case under Chapter 13 of the Bankruptcy Code. Having been no objection within the time required.

WHEREFORE IT HEREBY ORDERED THAT:

- I. Debtor's Chapter 7 bankruptcy case is converted to a case under Chapter 13 of the bankruptcy code.

ENTERED:

Honorable Judge Carol A. Doyle
UNITED STATES BANKRUPTCY JUDGE

DATED: _____

FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re: Grant, John William

Case No. 20-02914
Chapter 7
(Honorable Judge Carol A. Doyle)

Debtor (s)

ORDER TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

THAT THIS CAUSE COMING on to be heard before **Honorable Judge Carol A. Doyle** before this Court, due Notice having been given, the Honorable Court apprised in all the premises for the debtor filing her motion and application to convert in accordance with 11 U.S.C. §706 (a), seeking to convert this case under Chapter 7 to a case under Chapter 13 of the Bankruptcy Code. Having been no objection within the time required.

WHEREFORE IT HEREBY ORDERED THAT:

- I. Debtor's Chapter 7 bankruptcy case is converted to a case under Chapter 13 of the bankruptcy code.

ENTERED:

Honorable Judge Carol A. Doyle
UNITED STATES BANKRUPTCY JUDGE

DATED: _ _ _ _ _